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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT**DISTRICT OF NEVADA**

In re:

THE RHODES COMPANIES, LLC, aka
 "Rhodes Homes," et al.,¹

Debtors.

Case No.: BK-S-09-14814-LBR
 (Jointly Administered)

Chapter 11

Affects:

- ☐ All Debtors
☒ Affects the following Debtor(s)

Hearing Date: October 19, 2009
 Hearing Time: 9:30 a.m.
 Courtroom 1

¹ The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

RHODES DESIGN & DEVELOPMENT
CORPORATION

**NOTICE OF MOTION OF DEBTOR FOR ORDER APPROVING SETTLEMENT
AGREEMENT WITH NEVADA STATE CONTRACTORS BOARD PURSUANT TO
BANKRUPTCY RULE 9019**

PLEASE TAKE NOTICE THAT the Rhodes Design & Development Corporation, debtor and debtor in possession herein (the “Debtor” or “RD&D”), hereby files this motion (the “Motion”) for the entry of an order pursuant to Federal Rule of Bankruptcy Procedure 9019(a) approving the terms of the Settlement Agreement (the “Settlement”) by and among RD&D and the Nevada State Contractors Board (the “Board”), which, among other things, provides for the resolution of certain allegations and claims made by the Board, and allows RD&D to continue to operate as a licensed contractor in the State of Nevada and thereby generate revenue and maximize its assets for the benefit of the estate. Rhodes Homes seeks approval of the Settlement and authorization to take any and all actions reasonably necessary to effectuate the Settlement.

PLEASE TAKE FURTHER NOTICE that a copy of the above-referenced Motion is on file with and available from the clerk of the United States Bankruptcy Court for the District of Nevada, Foley Federal Building, 300 S. Las Vegas Blvd., Las Vegas, Nevada 89101; via the bankruptcy court's website at www.nvb.uscourts.gov (a PACER account is required); through the Debtors' claims agent's website: www.omnimgt.com/rhodes; or by calling (866) 989-6144.

PLEASE TAKE FURTHER NOTICE THAT per Order of the Court, this Motion is being heard on shortened notice.

PLEASE TAKE FURTHER NOTICE that any opposition to the requested relief must be filed by the date and time of the hearing on the Motion. If an objection is not timely filed and served, the relief requested may be granted without a hearing pursuant to Local Rule 9014(d)(3).

- If you object to the relief requested, you *must* file a WRITTEN response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.
- If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:
 - The court may *refuse* to allow you to *speak* at the scheduled hearing; and
 - The court may *rule against you* without formally calling the matter at the hearing.

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PLEASE TAKE FURTHER NOTICE that this hearing may be continued from time to time without further notice except for the announcement of any adjourned dates and time at the above noticed hearing or any adjournment thereof.

LARSON & STEPHENS